Manslaughter, vehicular, criminal negligence

# State of Maryland,

City of Baltimore, to wit:

# IN THE CIRCUIT COURT FOR BALTIMORE CITY

The State of Maryland

-vs-ALEXIS ACOSTA

**Defendant:** 

## INDICTMENT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT, late of said City, heretofore on or about <u>June 21</u>, <u>2022</u>, at <u>2500 E Biddle Street Baltimore MD 21213</u>, did cause the death of Terry Harrell by driving, operating and controlling a vehicle and vessel in a criminally negligent manner, in violation of Criminal Law Article, Section 2-210 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

CR 2-210, 1 1611

### **SECOND COUNT**

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT, late of said City, heretofore on or about <u>June 21</u>, <u>2022</u>, at <u>2500 E Biddle Street Baltimore MD 21213</u>, did drive a motor vehicle in a reckless manner that indicated a wanton or willful disregard for the safety of others; against the peace, government and dignity of the State.

TR 21-901.1(a), Reckless Driving

#### THIRD COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT, late of said City, heretofore on or about <u>June 21</u>, <u>2022</u>, at <u>2500 E Biddle Street Baltimore MD 21213</u>, did drive a motor vehicle in a careless or imprudent manner that endangered both property and the life of a person in a negligent manner; against the peace, government and dignity of the State.

TR 21-901.1(b), Negligent Driving

#### **FOURTH COUNT**

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT, late of said City, heretofore on or about <u>June 21</u>, <u>2022</u>, at <u>2500 E Biddle Street Baltimore MD 21213</u>, did fail to control his speed while operating a vehicle in order to avoid a collision; against the peace, government and dignity of the State.

TR 21-801(b), Fail to Control Speed to Avoid a Collision

#### **FIFTH COUNT**

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT, late of said City, heretofore on or about <u>June 21</u>, <u>2022</u>, at <u>2500 E Biddle Street Baltimore MD 21213</u>, did cause the death of a vulnerable individual as a result of operating a motor vehicle in violation of the aforementioned Maryland Transportation Article laws; against the peace, government and dignity of the State.

TR 21-901.3, Death of Vulnerable Individual Caused by Motor Vehicle

#### **SIXTH COUNT**

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT, late of said City, heretofore on or about <u>June 21</u>, <u>2022</u>, at <u>2500 E Biddle Street Baltimore MD 21213</u>, did drive an emergency vehicle without due regard for the safety of all persons, against the peace, government and dignity of the State. TR 21-106(d), Emergency Vehicles

The State's Attorney for the City of Baltimore